

## **Remarks**

In the present response, five claims (7, 11, 22, 30, and 42) are amended. Claims 7, 11, 22, 30 and 35-51 are presented for examination.

### **I. Not All Claims Rejected**

Although independent claim 51 is noted as being rejected in the Office Action Summary section, the Office Action did not provide any arguments in the Detailed Action section for rejecting this claim. Applicants have not been provided an opportunity to respond to any rejections for this claim. Therefore, Applicants respectfully request either allowance of independent claim 51 or a subsequent non-final rejection if arguments are provided for rejecting claim 51.

### **II. Claims Rejection: 35 USC § 103(a)**

Claim 11 is rejected under 35 USC § 103(a) as being anticipated unpatentable over USPN 5,689,654 (Kikinis). For at least the following reasons, Applicants respectfully traverse this rejection.

Claim 11 recites numerous limitations that are not taught or suggested in Kikinis. By way of example, claim 11 recites:

interface elements are exposed on the externally accessible side for use when the multi-functional device is inserted into the internal device bay and when the multi-functional device is removed from the internal device bay; and  
the interface elements comprise at least one of a volume control dial, a headphone jack and a tuner knob.

Nowhere does Kikinis teach or suggest these recitations. The Office Action cites FIGS. 5, 22, and 23 of Kikinis. Applicants respectfully disagree. FIG. 5 of Kikinis shows a PDA 10 that is docked in a notebook computer 172. Kikinis does not teach or suggest that the PDA 10 has interface elements exposed on an externally accessible side for use

when the PDA 10 is inserted into the notebook computer 172 and when the PDA 10 is removed from the bay of the notebook computer 172.

FIG. 22 of Kikinis shows a notebook computer 1011 (see FIG. 21A) having a plurality of modules or bays (1019, 1021, 1023, etc.). Kikinis does not teach or suggest that the PDA that inserts into the notebook 1011 of FIG. 22 has interface elements exposed on an externally accessible side for use when the PDA is inserted into the notebook computer 1011 and when the PDA is removed from the bay of the notebook computer 1011.

FIG. 23 of Kikinis shows a function module 1061 having an eject button 1079 on a front face 1077 (see 21: 53-57). The Office Action also argues that this front face includes LEDs. Nowhere does Kikinis teach or suggest that this front face include at least one of a volume control dial, a headphone jack and a tuner knob.

For at least these reasons, claim 11 is allowable over Kikinis.

### **III. Claims Rejection: 35 USC § 103(a)**

Claims 7, 22, 30, 35-40, and 42 are rejected under 35 USC § 102(b) as being unpatentable over Kikinis in view of USPN 7,054,965 (Bell). For at least the following reasons, these rejections are traversed.

#### **Claim 7**

Independent claim 7 recites numerous recitations that are not taught or suggested in Kikinis in view of Bell. For example, claim 7 recites “the multi-functional device comprises at least one of a still image camera, a video camera, a video recorder, and a digital camcorder.” The Office Action does not cite any location in either Kikinis or Bell for teaching or suggesting these recitations. Such teachings or suggestions do not exist. Further, nowhere does Kikinis or Bell teach or suggest a television, tape player, and radio.

For at least these reasons, independent claim 7 is allowable over Kikinis in view of Bell.

**Claim 22**

Independent claim 22 recites numerous recitations that are not taught or suggested in Kikinis in view of Bell. For example, claim 22 recites “at least one of a still image capturing device and a video image capturing device.” The Office Action does not cite any location in either Kikinis or Bell for teaching or suggesting these recitations. Such teachings or suggestions do not exist. Further, nowhere does Kikinis or Bell teach or suggest a television, tape player, and radio.

For at least these reasons, independent claim 22 is allowable over Kikinis in view of Bell.

**Claim 30**

Independent claim 30 recites numerous recitations that are not taught or suggested in Kikinis in view of Bell. For example, claim 30 recites “the multi-functional device comprises at least one device for capturing digital still images and digital video.” The Office Action does not cite any location in either Kikinis or Bell for teaching or suggesting these recitations. Such teachings or suggestions do not exist. Further, nowhere does Kikinis or Bell teach or suggest a television, tape player, and radio.

For at least these reasons, independent claim 30 is allowable over Kikinis in view of Bell.

**Claim 35**

Independent claim 35 recites numerous recitations that are not taught or suggested in Kikinis in view of Bell. For example, claim 35 recites “a camera insertable into an internal device bay” of a computer. The Office Action admits that “Kikinis lacks a camera insertable in the internal device bay and connectable to the electrical connector ...” (see OA at p. 6). Applicants agree. The Office Action, however, attempts to cure this deficiency with Bell and cites FIG. 8 and column 9, lines 6-9. Applicants respectfully disagree.

Column 9, lines 6-9 of Bell states “a digital camera may be configured to periodically capture images and provide them as input to a computing system without further interaction from the user.” This section of Bell is not related to FIG. 8. In other

words, Bell never states or even suggests that the digital camera discussed in column 9 is insertable into the bay 834 of computer 806b shown in FIG. 8B of Bell. By contrast, Bell states that the core component 802a associated with FIG. 8B is a PDA (see column 22, lines 12- 29). Bell never suggests that core component 802a is at least one device for capturing digital still images and digital video.

For at least these reasons, independent claim 35 and its dependent claims are allowable over Kikinis in view of Bell.

### **Claim 39**

Independent claim 39 recites numerous recitations that are not taught or suggested in Kikinis in view of Bell. For example, claim 39 recites “a video device insertable into an internal device bay” of a computer. The Office Action cites FIG. 8 of Bell for teaching these recitations. Applicants respectfully disagree.

Bell never discusses a video device as recited in claim 39. Column 9, lines 6-9 of Bell states “a digital camera may be configured to periodically capture images and provide them as input to a computing system without further interaction from the user.” This section of Bell is not related to FIG. 8. In other words, Bell never states or even suggests that the digital camera discussed in column 9 is insertable into the bay 834 of computer 806b shown in FIG. 8B of Bell. By contrast, Bell states that the core component 802a associated with FIG. 8B is a PDA (see column 22, lines 12- 29). Bell never suggests that core component 802a is a video device.

For at least these reasons, independent claim 39 and its dependent claims are allowable over Kikinis in view of Bell.

### **Claim 42**

Independent claim 42 recites numerous recitations that are not taught or suggested in Kikinis in view of Bell. For example, claim 42 recites “a video capture device insertable into the internal device bay” of a computer. The Office Action admits that “Kikinis lacks a camera insertable in the internal device bay and connectable to the electrical connector ...” (see OA at p. 6). Applicants agree. The Office Action, however,

attempts to cure this deficiency with Bell and cites FIG. 8 and column 9, lines 6-9. Applicants respectfully disagree.

Column 9, lines 6-9 of Bell states “a digital camera may be configured to periodically capture images and provide them as input to a computing system without further interaction from the user.” This section of Bell is not related to FIG. 8. In other words, Bell never states or even suggests that the digital camera discussed in column 9 is insertable into the bay 834 of computer 806b shown in FIG. 8B of Bell. By contrast, Bell states that the core component 802a associated with FIG. 8B is a PDA (see column 22, lines 12- 29). Bell never suggests that core component 802a is a video capture device.

For at least these reasons, independent claim 42 is allowable over Kikinis in view of Bell.

#### **IV. Claims Rejection: 35 USC § 102(e)**

Claims 43-48 are rejected under 35 USC § 102(e) as being anticipated by Bell. For at least the following reasons, Applicants respectfully traverse this rejection.

##### **Claim 43**

Claim 43 recites numerous limitations that are not taught or suggested in Bell. By way of example, claim 43 recites a camera having a body that is insertable into an **internal** device bay of the personal electronic system. Bell does not teach or suggest this recitation. The Office Action cites Bell at FIG. 8 and column 9, lines 6-9. Applicants respectfully disagree.

Column 9, lines 6-9 of Bell states “a digital camera may be configured to periodically capture images and provide them as input to a computing system without further interaction from the user.” This section of Bell is not related to FIG. 8. In other words, Bell never states or even suggests that the digital camera discussed in column 9 is insertable into the bay 834 of computer 806b shown in FIG. 8B of Bell. By contrast, Bell states that the core component 802a associated with FIG. 8B is a PDA (see column 22, lines 12- 29). Bell also never suggests that core component 802a is a camera having a body that is insertable into an internal device bay of a personal electronic system.

For at least these reasons, claim 43 and its dependent claims are allowable over Smith.

#### **Claim 47**

Claim 47 recites numerous limitations that are not taught or suggested in Bell. By way of example, claim 47 recites a video device having a body that is insertable at least partially into an **internal** device bay of the personal electronic system. Bell does not teach or suggest this recitation. The Office Action cites Bell at FIG. 8 and column 9, lines 6-9. Applicants respectfully disagree.

Column 9, lines 6-9 of Bell states “a digital camera may be configured to periodically capture images and provide them as input to a computing system without further interaction from the user.” This section of Bell is not related to FIG. 8. In other words, Bell never states or even suggests that the digital camera discussed in column 9 is insertable into the bay 834 of computer 806b shown in FIG. 8B of Bell. By contrast, Bell states that the core component 802a associated with FIG. 8B is a PDA (see column 22, lines 12- 29). Bell also never suggests that core component 802a is a video device having a body that is insertable at least partially into an internal device bay of a personal electronic system.

For at least these reasons, claim 47 and its dependent claims are allowable over Bell.

#### **V. Claims Rejection: 35 USC § 103(a)**

Claim 49 is rejected under 35 USC § 103(a) as being unpatentable over Bell. Claim 49 depends from independent claim 47. For at least the reasons provided in section IV respectively, claim 49 is allowable over Bell.

#### **VI. Claims Rejection: 35 USC § 103(a)**

Claims 41 and 50 are rejected under 35 USC § 103(a) as being unpatentable over Kikinis in view of Bell and USPN 5,740,012 (Choi). Claim 41 depends from independent claim 39, and claim 50 depends from independent claim 47. As noted in sections III and IV, Bell and Kikinis fail to teach or suggest all the elements in independent claims 39 and

47. Choi fails to cure these deficiencies. For at least the reasons, dependent claims 41 and 50 are allowable over Kikinis, Bell, and Choi.

### **CONCLUSION**

In view of the above, Applicants believe that all pending claims are in condition for allowance. Allowance of these claims is respectfully requested.

Any inquiry regarding this Amendment and Response should be directed to Philip S. Lyren at Telephone No. 832-236-5529. In addition, all correspondence should continue to be directed to the following address:

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Respectfully submitted,

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